

April 19, 2023

VIA PRO SE INTAKE

Hon. Sarah Netburn, U.S.M.J.
United States District Court
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *Arthur Balder v. Susan Sarandon, et al*, Case No.: 1:22-cv-06401-JLR-SN

Hon. Judge Netburn:

I am the Plaintiff in this action. This letter is submitted pursuant to I.B. and I.G. of your Honor's Individual Practices rules and in response to your Honor's order dated February 13, 2023 (the "Order") [ECF Dkt. No. 69] and to address Defendants' letter [ECF Dkt. No. 69].

Plaintiff strongly opposes an extension of time for the reply due beyond April 27, 2023, taking into consideration the time loss caused by the system.

First, I am advised that any request for extension of time should be filed as soon as such necessities are foreseeable and arise. Defendants' attorneys recognise they got all the papers, Memorandum included, by April 13, 2023, and they file for an extension on April 19, 2023, almost a week later.

Second, Defendants' attorneys personal agendas and/or professional compromises, on a regular basis used as a pretext to delay this process, should not further burden Plaintiff neither these proceedings: they knew already on April 11 2023 that the papers in opposition were being filed.

Defendants' request of time extensions beyond what is due would be a privilege, because they would have more time than Plaintiff was allotted to. It was clear in your Honour's order that no delays would be admitted, Plaintiff follows such terms respectfully, while Defendants' attorneys systematically make requests that resemble too much invocation of privilege instead of showing respect for the Court's orders and for the nature of these proceedings, acting lightly towards the fact that their delaying tactics play a fundamental role in harming Plaintiff and Film indefinitely.

Defendants' attorneys cause for prolonging unduly the filing date ["a day I am out of the office for pre-planned travel"] is utterly frivolous and as such concerning that they use it so lightly, as usual on their side.

THEREFORE Plaintiff beseeches the Court Denies partially defendants' attorneys request, and grants permission to file no later than April 27 2023.

We greatly appreciate your Honour's time and consideration in this matter.

Respectfully Submitted,

/s/ Arthur Balder

Cc. All other Parties (via ECF).